

Attachment 6

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

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SHAUNA WILLIAMS, et al.,

Plaintiffs,

vs.

Case No. 23-CV-1057

REPRESENTATIVE DESTIN  
HALL, etc., et al.,  
Defendants.

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NORTH CAROLINA STATE
CONFERENCE OF THE NAACP, et al.,

Plaintiffs, Case No. 23-CV-1104

PHILIP BERGER, etc., et al.,

Defendants.

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The Remote Deposition of

JONATHAN RODDEN, Ph.D.

October 28, 2024  
11:00 a.m.

Cynthia Sullivan, RPR

1 APPEARANCES:

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3 On behalf of the Plaintiffs:

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1           REMOTE APPEARANCES, Continued:

2           ALSO PRESENT:

3                         Sean Trende

4                         ~   ~   ~   ~

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1 indicate here at the bottom of page 17, this is  
2 where you start looking at race versus party,  
3 and you indicate that, "The 2023 plan produces  
4 ten Republican leaning districts, three  
5 Democratic leaning district, and one highly  
6 competitive district."

7 Is it fair to say that your -- how  
8 do you tabulate -- how do you define a  
9 Republican leaning district?

10 A. This is using the -- the index  
11 of -- of Republican or Democratic voting that  
12 was also used by -- by Dr. Barber, and anything  
13 that is -- that is above .5 averaging over all  
14 these races -- averaging over all these  
15 elections is considered a Republican leaning  
16 district.

17 Q. I see. Okay. So essentially  
18 50 percent plus one vote on Dr. Barber's  
19 partisan voting index would -- would make it  
20 Republican leaning in your mind?

21 A. Yes.

22 Q. Okay. And if we wanted to, we  
23 could have defined a Republican leaning  
24 district, for example, as a district that had  
25 say a minimum of a 55 percent vote share; isn't

REPORTER'S CERTIFICATE

The State of Ohio, )

SS:

County of Cuyahoga.)

I, Cynthia Sullivan, a Notary  
in and for the State of Ohio, duly  
qualified, do hereby certify  
the above-named witness, JONATHAN A.  
., was by me first duly sworn to  
truth, the whole truth and nothing  
but the truth in the cause aforesaid; that the  
statement given by the above-referenced  
witness was by me reduced to stenotypy in the  
presence of the said witness; afterwards  
and that the foregoing is a true  
transcription of the testimony so  
given by the above-referenced witness.

I do further certify that this deposition was taken at the time and place in the foregoing caption specified and was completed without adjournment.

1           I do further certify that I am not  
2        a relative, counsel or attorney for either  
3        party, or otherwise interested in the event of  
4        this action.

5           IN WITNESS WHEREOF, I have hereunto  
6        set my hand and affixed my seal of office at  
7        Cleveland, Ohio, on this 7th day of November, 2024.

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13           Cynthia Sullivan

14           Cynthia Sullivan, Notary Public  
15        within and for the State of Ohio

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17        My commission expires October 17, 2026.  
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